

# EXHIBIT A

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**From:** Joseph Aronsohn <jaronsohn@hueston.com>  
**Sent:** Monday, February 5, 2024 11:11 AM  
**To:** Anne-Raphaëlle Aubry; Medtronic/Speyside [INT]; Christina V. Rayburn; Moez M. Kaba; Christine Woodin; Farnan, Kelly E.; Metzler, Sara M.  
**Cc:** QE Speyside; Jack Blumenfeld; Egan, Brian P.  
**Subject:** Re: Speyside v. Medtronic - pre-trial exchange schedule

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

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[EXTERNAL EMAIL from [jaronsohn@hueston.com](mailto:jaronsohn@hueston.com)]

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Anne,

Thank you for your proposal. As you know, after the parties requested a new trial date, the case was reassigned to Judge Jennifer Hall. Judge Hall has not given the parties any indication that the Court is available for an April trial date. Moreover, the parties are awaiting several significant pre-trial rulings—including on claim construction, motions for summary judgment, and *Daubert* motions—and have not received guidance on when these rulings will issue.

Pending additional guidance from the Court, any exchange would be premature and could cause the parties to incur significant unnecessary cost. We will confer on this issue once a trial date is scheduled.

Best,

Joseph

Joseph Aronsohn

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[Biography](#)

**From:** Anne-Raphaëlle Aubry <anneraphaelleaubry@quinnemanuel.com>

**Date:** Wednesday, January 31, 2024 at 7:17 AM

**To:** Medtronic/Speyside [INT] <medtronic\_speyside@hueston.com>, Christina V. Rayburn <crayburn@hueston.com>, Moez M. Kaba <mkaba@hueston.com>, Christine Woodin <cwoodin@hueston.com>, Farnan, Kelly E. <Farnan@RLF.com>, Metzler, Sara M. <Metzler@rlf.com>

**Cc:** QE Speyside <qespeyside@quinnemanuel.com>, Jack Blumenfeld <jblumenfeld@morrisnichols.com>, Egan, Brian P. <began@morrisnichols.com>

**Subject:** Speyside v. Medtronic - pre-trial exchange schedule

Counsel,

Below is an updated pre-trial exchange proposal. Because the last submissions that the parties made to the Court requested an April 1<sup>st</sup> trial date, we believe the parties should work together to make sure the case is ready for trial by April 1<sup>st</sup>. If the Court decides on a later trial date in the interim, we can adjust the schedule, if necessary.

Please let us know your thoughts on the proposed schedule as soon as possible.

Best,

Anne

Description	Speyside's Update Pre-Trial Exchange Proposal
Speyside serves draft Pretrial Order (including Joint Statement of Uncontested Facts)	Feb. 14, 2024
Parties serve Exhibit Lists	Feb. 16, 2024
Parties serve Deposition Designations	Feb. 16, 2024
Parties serve Witness Lists (including identification of witnesses being made available for trial)	Feb. 16, 2024
Speyside serves draft Preliminary and Final Jury Instructions, Voir Dire, and Verdict Form	Feb. 21, 2024

Parties meet and confer regarding MILs	Feb. 23, 2024	PLEASE NOTE: This message, including any attachments, may include privileged, confidential and/or inside information. Any distribution or use of this communication by anyone other than the intended recipient(s) is strictly prohibited and may be unlawful. If you are not the intended recipient, please notify the sender by replying to this message and then delete it from your system. Thank you.
Parties serve MILs	<del>Feb. 26, 2024</del>	
Medtronic serves edits to draft Pretrial Order	March 1, 2024	
Parties serve objections to Witness Lists	March 5, 2024	
Parties serve objections to Exhibit Lists	March 5, 2024	
Parties serve objections to Deposition Designations and Counter-Designations	March 5, 2024	
Medtronic serves responses to draft Preliminary and Final Jury Instructions, Voir Dire, and Verdict Form	March 6, 2024	
Parties serve responses to MILs	March 8, 2024	
Parties meet and confer regarding Preliminary and Final Jury Instructions, Voir Dire, and Verdict Form	March 13, 2024	
Parties serve objections to Counter-Designations	March 13, 2024	
Parties exchange final edits to draft Pretrial Order	March 13, 2024	
Parties serve replies to MILs	March 15, 2024	
Proposed Pretrial Order and MILs ready for filing	March 18, 2024	
Preliminary and Final Jury Instructions, Voir Dire, and Verdict Form ready for filing	March 18, 2024	